



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
White River Field Office
220 East Market Street
Meeker, CO 81641



February 13, 2020

MEMORANDUM

TO: Elijah Waters, District Manager, Northwest Colorado District

FROM: Kent E. Walter, Field Office Manager, White River Field Office

SUBJECT: Wild Horses Outside of the Piceance-East Douglas Herd Management Area

Introduction

I have concluded my review of the information presented to me from WRFO staff via Memorandum dated February 5, 2020 with recommendations to begin gather and removal of excess wild horses that are located outside of the Piceance-East Douglas Herd Management Area (PEDHMA). I have concluded my review of the information and carefully considered the requirements of the Free Wild and Free-Roaming Horses and Burros Act of 1971 and BLM Manual 4720, which define excess animals as those animals which must be removed from an area to preserve and maintain a Thriving Natural Ecological Balance (TNEB) and multiple-use relationships in those areas. Based on my review of the available information, it appears that conditions have not changed since BLM prepared DOI-BLM-CO-N05-2015-0023-EA or DOI-BLM-CO-N05-2017-0056-EA. Action has taken place to reduce the population of excess wild horses located outside of the PEDHMA however these actions have been outpaced by the continued growth of the wild horse population. Accordingly, wild horses and burros located outside of the PEDHMA in areas not designated for their long-term maintenance meet the definition of excess animals.

Further, the WRFO continues to receive written requests from ranching operations requesting removal of wild horses from outside of the PEDHMA that have relocated on to the ranch's private property (e.g., request dated August 19, 2019). The BLM's regulations at 43 CFR 4720.2-1 state: "Upon written request from the private landowner to any representative of the Bureau of Land Management, the authorized officer shall remove stray wild horses and burros from private lands as soon as practicable."

It is not feasible to attempt to herd the excess wild horses that are located outside of the boundary fence of the PEDHMA back into the PEDHMA, since the 2016 Wild Horse Aerial Inventory documented that the population of wild horses within the PEDHMA is approximately triple the upper end of the Appropriate Management Level (135 to 235 animals), after factoring in the estimated 20 percent annual recruitment rates for the years 2016 – 2019. This estimate does not include the expected recruitment in the year 2020.

CONCLUSION

Based upon my review of the information, and after consideration of all applicable laws, regulations and rules, it is my determination that all wild horses that have relocated outside of the PEDHMA boundaries are excess, therefore I have instructed my staff to complete appropriate NEPA review (DOI-BLM-CO-N05-2018-0071-DNA) and develop a priority removal plan for the excess wild horses that have relocated outside of the PEDHMA based on ecological impacts, number of excess wild horses which occupy a given area, landowner requests for removal off of private lands, and other ecological concerns such as threatened and sensitive plants, cultural resources, and riparian issues. BLM may need to reconsider priorities and make other adjustments to gather operations based on the outcomes of each gather and removal operation, and any new information that becomes available during the multiple-year process.

A handwritten signature in blue ink, reading "Kent E. Walther". The signature is fluid and cursive, with the first name "Kent" and last name "Walther" clearly legible.